



## **Comments and Responses on the Correction to the Prevention of Significant Deterioration New Source Review Permit for LaFarge Sugar Creek Plant Project Number 2004-11-106**

This document responds to comments made on the correction to the PSD permit application. The numbers of the Special Conditions in the comments may have changed. The numbers referenced in the response reflect the final Special Condition numbering.

**The following comments were submitted to the Air Pollution Control Program by the LaFarge Sugar Creek Plant in an email dated August 24, 2006.**

**Comment:**

Condition 4 should say "BACT for PM10 emissions from the clinker and hot clinker loadouts identified as EP 82 and EP 83 is the use of a telescoping chute and a baghouse; you could actually just make this a "z." in the Condition 3.

**Air Pollution Control Program's Response:**

Special Condition Number 4 was revised in a previous amendment request to update the point description for EP 83 from clinker truck loadout to hot clinker loadout and also to add a second hot clinker loadout identified as EP 82 to this condition. At the time, the process flow diagrams indicated the use of two (2) hot clinker loadout systems instead of only one (1) hot clinker loadout system indicated in the original plant layout. However, during the evaluation of this PSD correction, LaFarge indicated that EP82 and EP83 are operated as the clinker and hot clinker loadouts, respectively, with baghouse control. These emission points were evaluated as the clinker and hot clinker loadouts with baghouse controls in the modeling analysis. Therefore, Special Condition 4 is corrected as requested. However, the condition was not re-numbered and will remain Special Condition 4.

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**Comment:**

Condition 7. I would request that the compliance demonstration be once every 30 months to correspond with the PCMACT required dioxin/furan testing frequency requirement.

**Air Pollution Control Program's Response:**

The APCP agrees to change the testing frequency requirement to every 30 months as requested. Special Condition 7 will read, "BACT for PM<sub>10</sub> emissions from the raw mill and preheater/precalciner rotary kiln system identified as EP 77 is an emission rate not to exceed 164.15 pounds per hour while the roller mill is not in operation and 49.95 pounds per hour while the roller mill is in operation. This limit is for total PM<sub>10</sub>, consisting of both condensable and filterable fractions. The installation shall demonstrate compliance with this limit through compliance demonstrations once every 30 months, consisting of three 1-hour runs."

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